

comparing the identified device to a database of devices for which user interface resource components are available for implementing the functions of the device and determining whether the device is listed in the database;

retrieving user interface components from a database of interface components stored separately from the device for implementing specific functions of the device; and creating the user interface from the assembled user interface components.

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REMARKS

Claim Amendments

Support for the amendments to claims 1, 6, 11, and 16 may be found at least on page 9, lines 21-23, and on page 10, lines 29-31.

§ 101 Rejection - Claims 16-20

The examiner rejected claims 16-20 under 35 U.S.C. § 101 as being directed to non-statutory subject matter. Claim 16 has been amended as suggested by the examiner. It is therefore believed that the rejection to claim 16 and its dependent claims 17-20 is overcome.

§ 103 Rejection - Claims 1-11, 13-16, and 18-20

The examiner rejected claims 1-11, 13-16, and 18-20 under 35 U.S.C. § 103(a) as being unpatentable over Douma et al. (Douma, US Pat. No. 5,990,884).

In identifying the differences between Douma and Applicant's claimed invention, the examiner indicated the following:

Although Douma discloses the resource database to be separate databases stored individually in each device rather than a single database containing resources of all device, however, it would have been obvious to an artisan at the time of the invention to use any one of the two options depending on the implementation method.

The examiner is therefore suggesting that a rearrangement of the structure of the Douma apparatus would have been obvious to arrive at Applicant's claimed invention. However, Applicant kindly points out that the mere fact that a worker in the art could rearrange the parts of a reference device to meet the terms of the claims is not by itself sufficient to support a finding of obviousness. The *prior art* must provide a motivation or reason for

the worker in the art, without the benefit of Applicant's specification, to make the necessary changes in the reference device. M.P.E.P. § 2144.04 VI(C). Although the examiner indicated that "the end results would be equivalent in providing the necessary device information to the processor in generating the proper interface specific to the device requested" this statement of motivation does not appear anywhere in the cited art.

It is therefore clear that Douma teaches that the resource information is stored locally in each respective multimedia device rather than in a central resource database. However, Douma does not teach a resource database including the user interface components where the resource database is stored separately from the device as claimed in claims 1, 6, 11, and 16 as amended herein. An advantage of such a centralized database, as provided by Applicant's specification, is that the resources database may be updated via a single information storage medium or via downloading updated information via a network (page 9, lines 23-31). In addition, such a centralized resourced database allows for the user interface generator to retrieve user interface components from the resources database without user intervention (page 10, lines 29-31), as claimed in claim 1 as amended herein. Douma teaches away from Applicant's device in that user intervention is required to retrieve the multimedia device interface specifications:

In operation, as illustrated in FIG. 6, using the GUI program at PC/Web TV 26, the user selects a multimedia component in his or her A/V system 14 and requests control of that component in step 600. In step 602, the selected multimedia component transfers an appropriate application program to intelligent A/V receiver 10. (col. 7, lines 13-17)

Thus, contrary to the examiner's statement that Applicant's system and Douma's system are equivalent, they are not because Douma's system requires user intervention to access the device interface specifications whereas Applicant's system does not, and because Applicant's resource database containing the user interface components is stored separately from the respective device, whereas the components are stored in each individual device in Douma's system. As indicated by the cited passages of Applicant's specification, storing the interface components in a separate database is no mere rearrangement, but rather an additional feature not taught by Douma that provides advantages not taught by Douma.

Regarding claims 3 and 4, and the amendments to the claims, contrary to the examiner's assertion that "by disclosing an automatic 'two-way' communication method between multimedia devices and the controlling system, Douma indicates/suggests that the device and resource databases are created without requiring user intervention," Douma does not. In fact, Douma discloses no such "automatic" system, nor does Douma disclose a device database created without user intervention as claimed, nor does Douma disclose a resource database created without user intervention as claimed. The cited passage of Douma (col. 6, lines 45-61) merely describes the inclusion of a processor and interface data in each individual multimedia device. Nowhere does the cited passage discuss or mention the concepts of "automatic" or "without user intervention" as asserted by the examiner. In fact, Douma actually teaches away from such concepts in FIG. 6 and in col. 7, lines 13-30 where user intervention is specifically required. It is therefore believed that the rejection to claims 1, 6, 11, and 16, and to their respective dependent claims (M.P.E.P. § 2143.03), is overcome.

§ 103 Rejection - Claims 12 and 17

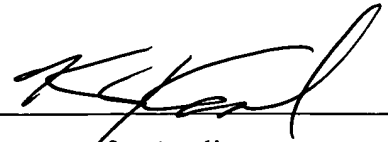
The examiner rejected claims 12 and 17 over Douma in view of Naughton et al. (Naughton, US Patent No. 6,020,881).

As discussed with respect to claims 1-11, 13-16, and 18-20, the independent claims from which claims 12 and 17 ^{depend} are unobvious. As a result of the dependency, claims 12 and 17 are likewise unobvious (M.P.E.P. § 2143.03). It is therefore believed that the rejection is overcome.

CONCLUSION

Claims 1, 6, 11, and 16 have been amended herein to further define the claimed invention. Arguments in favor of the patentability of the claims and of the insufficiency of the § 103 rejections have been set forth. Claim 16 has been amended to overcome the § 101 rejection. As a result, it is believed that all rejections have been overcome. In light of the foregoing, reconsideration of the claims is hereby requested, and a Notice of Allowance is earnestly solicited.

Respectfully submitted,



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